

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

IN RE: MOVEIT CUSTOMER DATA  
SECURITY BREACH LITIGATION

This Document Relates To:

MDL No. 1:23-md-03083-ADB-PGL

ALL CASES

**Revised MDL Order No. 18**  
**(CAC and Rule 12 Scheduling and Structure Proposals)**

The Court hereby orders the following briefing schedule and structure.

**I. Consolidated Amended Complaint and Rule 12 Motion Schedule**

Having reviewed the parties' proposal, the Court hereby orders the following schedule for the filing of the Consolidated Amended Complaint, Rule 12 motions, and associated briefing.

Event	Deadline
CAC Filed	Friday, December 6, 2024
Bellwether Defendants File Rule 12 Motions to Dismiss	Tuesday, February 4, 2025
Plaintiffs' Opposition Due	Monday, April 7, 2025
Bellwether Defendants' Replies Due	Thursday, May 22, 2025
Oral Argument	To be determined at the May status conference

**II. Structure of Rule 12 Motions**

As explained at the October status conference, see [ECF No. 1269, 23:7-10], and set forth in ECF No. 1267, the Bellwether Vendors and Bellwether VCEs/VCECs underneath each Vendor shall submit combined/joint motions, for a total of two motions:

- PBI and PBI's VCEs/VCECs Motion: PBI, Genworth, TIAA, and Milliman/MEMBERS
- Welltok and Welltok's VCEs/VCECs Motion: Welltok, Sutter Health, OFS Healthcare System, Corewell Health, Virginia Mason Franciscan Health, and CHI Health - NE

The Bellwether Vendors and VCEs/VCECs shall have sixty pages for their respective combined motions to dismiss. The Bellwether Plaintiffs shall have sixty pages for their oppositions. The Bellwether VCEs/VCECs underneath each Vendor shall have a thirty-page reply brief.

**SO ORDERED.**

November 15, 2024

/s/ Allison D. Burroughs  
ALLISON D. BURROUGHS  
U.S. DISTRICT JUDGE